

2.0 PROJECT ORGANIZATION AND RESPONSIBILITIES

2.1 Project Organization

This section defines the organizational roles and responsibilities for PMC-related work.

2.1.1 Remediation Venture Office

The RVO provides direction and conducts oversight of the PMC, has overall policy and issue-resolution authority, and is responsible for Regulatory Agency interactions. The RVO is comprised of personnel representing the U.S. Army Program Manager, Shell Oil Company, and the U.S. Fish and Wildlife Service (USFWS).

2.1.2 Program Management Contractor

The PMC is the integrating contractor with responsibility for implementation of the ROD and designated site support operations at RMA. The PMC conducts the following activities:

- Engineering design
- Procurement of subcontractors for construction, demolition, remediation efforts, and site support operations
- Oversight and management of subcontracted activities
- Quality assurance and quality control
- Preparation of closure documentation

2.1.3 PMC Subcontractors

The PMC Subcontractors perform tasks to safely execute the remedy, including site support operations, construction, demolition, and remediation activities.

2.1.4 Line Management and Safety Support Staff

The PMC line management and safety support staff organizational structure and reporting relationship are shown in Figure 2-1. For each implementation project, line management has functional supervision and oversight responsibility for the assigned health and safety staff. The PMC Health and Safety Manager has administrative and technical supervision responsibilities for the health and safety staff. This reporting relationship ensures an appropriate level of health and safety staff support and an independent health and safety oversight function is provided for each implementation project and site support operations.

2.2 Responsibilities

2.2.1 General

Each person has a responsibility to understand how to perform assigned tasks safely, to work safely, to identify and help correct potential problems, and to stop work if an imminent danger exists. Line management has primary accountability for planning, leading, and controlling safety performance. Health and safety personnel support line management by providing information, technical analysis, advice and assistance, and by auditing safety performance.

2.2.2 All Site Personnel

All site personnel have responsibility for performing work in a safe manner as follows:

- Becoming familiar with the requirements, information, instructions, and emergency response actions contained in the PMC HASP and any applicable task-specific HASP
- Complying with all applicable health and safety rules, regulations, and procedures
- Monitoring the worksites for unauthorized personnel and unauthorized work

- Inspecting all tools and equipment, including PPE daily, prior to and during use
- Reporting any unsafe or potentially hazardous conditions to their supervisor
- Stopping work if an “imminent danger” situation exists
- Setting an example for safe work practices and attitudes by personal action and participation

2.2.3 PMC Subcontractor Manager

Each PMC Subcontractor Manager is responsible for ensuring that work is performed in a safe manner and in accordance with approved plans. Health and safety-related responsibilities include the following:

- Ensuring that all health and safety activities identified in PMC and task-specific HASPs are conducted and/or implemented
- Identifying operational changes that require modification of the task health and safety plans or procedures and ensuring that modifications are made and implemented
- Enforcing health and safety rules and compliance with the PMC and task-specific HASP
- Planning field work that uses appropriate safe procedures, equipment, and adequately trained personnel
- Conducting routine safety inspections of their work areas and ensuring timely corrective action(s)
- Setting an example for safe work practices and attitudes by personal action and participation

2.2.4 PMC Project Managers

Each PMC Project Manager is responsible for the management and execution of all work tasks issued to PMC Subcontractors. Health and safety-related responsibilities include the following:

- Developing and approving work plans and organizing the resources necessary for project execution
- Controlling the work effort to ensure conformance with plans
- Ensuring that each individual working on projects under his/her control understands the applicable HASP requirements and executes work in accordance with plans as written
- Ensuring that PMC-related field work is scheduled with adequate personnel and equipment resources to complete the job safely
- Setting an example for safe work practices and attitudes by personal action and participation

2.2.5 PMC Program Manager

The PMC Program Manager has overall authority and accountability for execution and performance of work. Health and safety-related responsibilities include the following:

- Overall project health and safety performance
- Ensuring implementation of the PMC HASP through coordination with the Project Managers and the PMC Health and Safety Staff
- Conducting periodic worksite inspections
- Participating in incident investigations
- Setting an example for safe work practices and attitudes by personal action and participation

2.2.6 PMC Subcontractor Health and Safety Personnel

Each PMC Subcontractor is responsible for designating a Health and Safety Supervisor (HSS) to assist Subcontractor management in the implementation of health and safety requirements and to act as liaison to the PMC regarding health and safety matters. This position may be a full-time or collateral duty position as determined by the requirements of the work to be performed and

specified in the Subcontract. The designated HSS shall meet the requirements of 29 CFR 1926.65(a)(3) and be knowledgeable in appropriate safety and health practices and regulations, and experienced in fulfilling health and safety staff functions for construction, hazardous waste, or site support operations as appropriate. Health and safety-related responsibilities include the following:

- Directing and coordinating health and safety monitoring and site training activities
- Ensuring that proper PPE is used by field teams
- Assisting in conducting and documenting daily safety briefings
- Monitoring compliance with the PMC and task-specific HASP
- Maintaining health and safety logbooks and other required records
- Determining upgrades or downgrades of PPE and other control measures based on site conditions and/or real-time and/or integrated monitoring results
- Monitoring decontamination practices to determine effectiveness and instituting corrective actions when necessary

2.2.7 PMC Health and Safety Staff

PMC health and safety staff responsibilities include the following:

- Analyzing and evaluating potential hazards of tasks and sites in support of project planning and execution
- Advising management on work plan and safety plan requirements and approaches
- Assisting management with safe work plan development and implementation
- Auditing project performance versus plan specifications

2.2.8 PMC Project Health and Safety Manager

The PMC Project Health and Safety Manager is responsible for providing support to the Program Manager in implementation of the PMC Health and Safety Program, and overall technical direction and supervision of the health and safety support personnel. Health and safety-related responsibilities include the following:

- Developing and approving the PMC HASP and HASP modifications as necessary
- Serving as the primary contact to resolve complex health and safety matters
- Approving new or revised written health and safety-related procedures and safe work practice instructions
- Reviewing and approving subcontractor task-specific HASP(s)
- Ensuring that each Subcontract clearly identifies the health and safety requirements for the task
- Assisting in the investigation of significant incidents
- Conducting periodic audits for compliance with the PMC HASP

Figure 2-1. PMC Line Management and Safety Organizational Structure

